1	GREGORY D. LATHAM, ESQ.		
	(admitted pro hac vice)		
2	Louisiana Bar No. 25955 STEPHEN KEPPER, ESQ.		
3	(admitted pro hac vice)		
	Louisiana Bar No. 34618		
4	INTELLECTUAL PROPERTY CONSULTING,	LLC	
	334 Carondelet Street, Suite B		
5	New Orleans, LA 70130		
	Telephone: (504) 322-7166		
6	Facsimile: (504) 322-7184 Email: glatham@iplawconsulting.com		
7	skepper@iplawconsulting.com		
8	AND		
9	JAMES E. WHITMIRE, ESQ.		
	Nevada Bar No. 6533		
10	SANTORO WHITMIRE		
	10100 W. Charleston Blvd., Suite 250		
11	Las Vegas, Nevada 89135		
12	Tel.: (702) 948-8771 / Fax: (702) 948-8773 Email: jwhitmire@santoronevada.com		
	Email: jwittimic@santoronevada.com		
13	Attorneys for Plaintiff		
14	UNITED STATED DISTRICT COURT		
ے ا	DISTRICT OF NEVADA		
15	DISTRICT	OF NEVADA	
16	BASKIM HOLDINGS, INC., a Louisiana	Case No.: 2:16-cv-01898-APG-GWF	
	corporation,		
17	DI - 1 - 4 - 66	CENTRAL APPLONATION AND ORDER TO	
18	Plaintiff v.	STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE JOINT	
10	v.	PRETRIAL ORDER	
19	TWO M, INC. d/b/a BABE'S CABARET		
,,	Defendant		
20	Defendant		
21	Defendants Two M. Inc. and Omar Ald	□ abbagh_and_plaintiff_Baskim Holdings_Inc_(the	
,,	Defendants, Two M, Inc. and Omar Aldabbagh, and plaintiff, Baskim Holdings, Inc. (the		
22	"Parties"), respectfully request that the Court grant the Parties a brief three (3) day extension to		
23	file their Joint Pretrial Order. In support of this request, the Parties state:		
	11	•	
24			

- 1. According to the original Scheduling Order (ECF No. 16), the Pretrial Order in this matter is due within thirty (30) days from the decision on the pending dispositive motions. On March 16, 2018, the Court denied the remaining summary judgment motions filed by Defendants (ECF Nos. 124 and 125). Pursuant to the Scheduling Order, the pretrial order is to be filed on or before April 16, 2018.
- 2. Over the past couple weeks, the Parties have been working diligently to finalize a Joint Pretrial Order; Baskim submitted a draft with its inserts to Defendants on April 9, 2018; Defendants responded with their inserts on April 13, 2018. During this time, the Parties conferred in good faith about the issues raised in the Pretrial Order.
- 3. As of the filing of this Stipulation, the Parties have been able to resolve the majority of the issues raised in the Pretrial Order; the requested additional time is needed to further confer about objections and stipulations relating to certain exhibits. The Parties anticipate that an additional three (3) days will be sufficient to finalize these issues.
- 4. At this time, there are no pending pre-trial deadlines in the captioned matter; no trial date has been set. Accordingly, the Parties submit that this very brief extension will not impact the Court's docket.

WHEREFORE, the Parties respectfully request that the Court enter an Order to allow the Parties a brief three (3) day extension, until April 19, 2018, to file their Joint Pretrial Order.

IT IS SO ORDERED:

Dated: April 16, 2018.

HON. ANDREW P. GORDON UNITED STATES DISTRICT JUDGE

1	Dated this 16 th day of April, 2018.	Dated this 16 th day of April, 2018.
2		
3	/s/ Greg Latham GREGORY D. LATHAM, ESQ. (admitted pro hac vice)	<u>_/s/ Martin I. Melendrez</u> MARTIN I. MELENDREZ, ESQ. Nevada Bar No. 7818
4	Louisiana Bar No. 25955	CHRISTOPHER A. ECCLES, ESQ.
5	STEPHEN KEPPER, ESQ. (admitted pro hac vice)	Nevada Bar No. 9798 HAWKINS MELENDREZ, P.C.
6	Louisiana Bar No. 34618 INTELLECTUAL PROPERTY	9555 Hillwood Drive, Suite 150 Las Vegas, Nevada 89134
7	CONSULTING, LLC 334 Carondelet Street, Suite B	Tel: (702) 318-8800 Fax:(702)318-8801
8	New Orleans, LA 70130 Telephone: (504) 322-7166	Email: mmelendrez@hawkinsmelendrez.com ceccles@hawkinsmelendrez.com
9	Facsimile: (504) 322-7184 Email: glatham@iplawconsulting.com	Attorneys for Two M., Inc. d/b/a Babe's
10	skepper@iplawconsulting.com	Cabaret
11	AND	
12	JAMES E. WHITMIRE, ESQ. Nevada Bar No. 6533	
13	SANTORO WHITMIRE 10100 W. Charleston Blvd., Suite 250	
14	Las Vegas, Nevada 89135 Tel.: (702) 948-8771 / Fax: (702) 948-8773	
15	Email: jwhitmire@santoronevada.com	
16	Attorneys for Plaintiff	
17		
18		
19		
20		
21		
22		
23		